

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION, Trustee-Applicant, v. BERNARD L. MADOFF INVESTMENT SECURITIES LLC, Defendant.	Adv. Pro. No. 08-01789 (SMB) SIPA Liquidation (Substantively Consolidated)
In re: BERNARD L. MADOFF, Debtor.	
IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC, Trustee, v. NATIXIS, NATIXIS CORPORATE & INVESTMENT BANK (f/k/a IXIS CORPORATE & INVESTMENT BANK), NATIXIS FINANCIAL PRODUCTS INC., BLOOM ASSET HOLDINGS FUND, and TENSYS LIMITED, Defendants.	Adv. Pro. No. 10-05353 (SMB)

**MOTION TO WITHDRAW JAMES R. SERRITELLA AS ATTORNEY OF RECORD
PURSUANT TO LOCAL BANKRUPTCY RULE 2090-1(e)**

This motion (the “Motion”) seeks, pursuant to Local Rule 2090-1(e) of the Local Bankruptcy Rules, an order withdrawing James R. Serritella, Esq., formerly of the law firm Davis & Gilbert LLP (“Davis & Gilbert”), as attorney of record for Defendants Natixis S.A. (in its own capacity and as successor-in-interest to IXIS Corporate & Investment Bank), Natixis Financial Products LLC (as successor-in-interest to Natixis Financial Products Inc.), and Bloom Asset

Holdings Fund (the “Defendants”). Mr. Serritella is no longer associated with Davis & Gilbert, effective the close of business on July 26, 2019, and thus no longer represents Defendants.

This Motion further seeks that James R. Serritella, Esq.’s name be removed from any applicable service lists, including the Court’s CM/ECF electronic notification list, maintained in the above-captioned cases.

I, Bruce M. Ginsberg, Esq., am an attorney at Davis & Gilbert who has previously appeared as an attorney of record in this case on behalf of the Defendants. Because I will continue to serve as an attorney of record, the Court’s approval of this Motion will not impact Davis & Gilbert’s representation of the Defendants, and will not result in prejudice or delay to any party.

WHEREFORE, for the reasons set forth herein, I respectfully request that the Court grant this Motion and order that James R. Serritella, Esq. is withdrawn as counsel of record and, thus, will no longer receive service or electronic notifications in the above-captioned cases. A proposed form of order granting the relief requested herein is annexed hereto as **Exhibit A**.

Dated: New York, New York
September 9, 2019

DAVIS & GILBERT LLP

/s/ Bruce M. Ginsberg
1740 Broadway
New York, New York 10019
Telephone: (212) 468-4800
Facsimile: (212) 468-4888
Joseph Cioffi
Email: jcioffi@dglaw.com
Bruce M. Ginsberg
Email: bginsberg@dglaw.com
H. Seiji Newman
Email: hsnewman@dglaw.com

*Attorneys for Defendants Natixis S.A. (in
its own capacity and as successor-in-
interest to IXIS Corporate & Investment*

*Bank), Natixis Financial Products LLC (as
successor-in-interest to Natixis Financial
Products Inc.), and Bloom Asset Holdings
Fund*